

FILED

MAR 21 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY CLERK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

DANIELLE SPEARS,

Plaintiff,

v.

NEXT BRIDGE HYDROCARBONS,
INC., et al.

Defendants.

CASE NO. 24-cv-00321-DC-RCG

CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO THE SECOND
AMENDED COMPLAINT

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (“FRCP”), Defendant Next Bridge Hydrocarbons, Inc. (“NBH”) requests a 45-day extension of time to May 12, 2025 to respond to Plaintiff’s Second Amended Complaint (ECF 12).

In support of this motion, NBH states as follows:

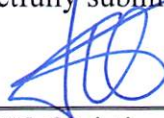
1. This motion is NBH’s first request for an extension of time with respect to this time limitation.
2. Counsel for NBH has conferred with pro se Plaintiff, and she consented to the requested extension of the deadline to respond to the Second Amended Complaint. Defendant John Brda is the only other party to have made an appearance at this time.
3. NBH requests the additional time to prepare its response to the Second Amended Complaint because of its breadth. On March 14, 2025, Plaintiff filed a Second Amended Complaint. The Second Amended Complaint is 88 pages with 254 numbered allegations. The

Second Amended Complaint further has 9 counts and seeks declaratory relief on a variety of statutory and constitutional bases.

WHEREFORE, NBH respectfully moves for an extension of time from March 28, 2025, to and including May 12, 2025, to move to dismiss or otherwise respond to the Second Amended Complaint.

Date: March 19, 2025

Respectfully submitted,



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**ATTORNEYS FOR DEFENDANT
NEXT BRIDGE HYDROCARBONS,
INC.**

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of March, 2025, I caused to be filed the foregoing through FedEx delivery to the Clerk of Court and I have emailed a copy of the foregoing to Plaintiff and all counsel of record.



James W. Christian